

HONORABLE MARSHA J. PECHMAN

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

JEROME RENSEL,

Plaintiff,

vs.

**HOLLAND AMERICA LINE INC.;
HOLLAND AMERICA LINE – USA, INC.;
HAL NEDERLAND N.V.; HOLLAND
AMERICA LINE N.V.,**

Defendants.

No. CV10-1427 MJP

JOINT STATUS REPORT

By and through their undersigned counsel, the parties submit the following Joint Status Report and Discovery Plan.

1. Ther is a cruise ship passenger personal injury case. It is not complex.
2. Local 39.1 mediation should be used.

JOINT STATUS REPORT - 1

Case No. CV10-1427 MJP

WEBB LAW FIRM
225 106TH AVENUE N.E.
BELLEVUE, WA. 98004
TEL. 425-454-3800

1 3. Mediation will be appropriate after the close of discovery.

2 4. The proposed deadline for joining additional parties is February 1, 2011.

3 5. The parties propose the following discovery plan:

4 A. The FRCP 26(f) conference took place the week of November 8, 2010.

5 Plaintiff and Defendants have made their FRCP 26(a) Initial Disclosures.

6 B. Discovery will be conducted with regard to liability and damages and
7 should not be conducted in phases nor limited other than by the FRCP's and Local Civil Rules.

8 C. No changes are needed with regard to the limitations on discovery
9 imposed under the Federal and Local Civil Rules.

10 D. Discovery will be conducted without limitations.

11 E. Orders are not required under FRCP 26(c) of LR 16(b) or (c).

12 6. Discovery can be completed by February 2, 2012.

13 7. The parties do not consent to a full-time Magistrate Judge.

14 8. Bifurcation is not necessary.

15 9. With respect to pretrial statements and the pretrial order called for by Local Rules
16 CR 16(e), (h), (i) and (l) and 16.1, the parties requests to submit a limited pretrial order listing
17 only witnesses, exhibits and objections to exhibits.
18

19 10. The parties have no other suggestions for shortening or simplifying the case.

20 11. The case will be ready for trial by May 16, 2012.

21 12. The case is set for jury trial.

22 13. The case will be tried in three (3) days.
23
24

25 JOINT STATUS REPORT - 2

26 Case No. CV10-1427 MJP

WEBB LAW FIRM
225 106TH AVENUE N.E.
BELLEVUE, WA. 98004
TEL. 425-454-3800

14. The names, addresses, and telephone numbers of all trial counsel are:

Plaintiff's Counsel

Gordon C. Webb
Webb Law Firm
225 106th avenue NE
Bellevue, WA 98004
Telephone: (425) 454-3800
Email: Gordon@webblawfirm.net

Defendant's Counsel

Louis A. Shields
Nielsen & Shields, PLLC
600 Stewart Street, Suite 1703
Seattle, WA 98101
Telephone: 206-728-1300
Email: las@nielsenshields.com

MERRIAM LAW FIRM

S/JOHN W. MERRIAM

JOHN W. MERRIAM, WSBA # 12749
MERRIAM LAW FIRM
4005 20TH AVENUE WEST, SUITE 210
SEATTLE, WA 98199
DIRECT TELEPHONE: 206.729.5252
DIRECT FAX: 206.729.1012
E-MAIL: [JOHN@MERRIAM-](mailto:JOHN@MERRIAM-MARITIMELAW.COM)
[MARITIMELAW.COM](mailto:JOHN@MERRIAM-MARITIMELAW.COM)

15. All parties have been served.

16. The parties do not request a scheduling conference prior to the Court's entry of a scheduling order.

DATED this 8th day of November, 2010.

WEBB LAW FIRM

S/GORDON WEBB

Gordon C. Webb, WSBA #22777
225 106th avenue NE
Bellevue, WA 98004
Telephone: 425-454-3800
E-mail: Gordon@webblawfirm.net

DATED this 8th day of November, 2010.

NIELSEN SHIELDS, PLLC

S/LOUIS SHIELDS

Louis A. Shields, WSBA #25740
600 Stewart Street, Suite 1703
Seattle, WA 98101
Telephone: 206-728-1300
Email: las@nielsenshields.com

JOINT STATUS REPORT - 3

Case No. CV10-1427 MJP

WEBB LAW FIRM
225 106TH AVENUE N.E.
BELLEVUE, WA. 98004
TEL. 425-454-3800

1 DATED this 8th day of November, 2010.

2 **MERRIAM LAW FIRM**

3 S/JOHN W. MERRIAM

4 _____
5 JOHN W. MERRIAM, WSBA # 12749
6 MERRIAM LAW FIRM
7 4005 20TH AVENUE WEST, SUITE 210
8 SEATTLE, WA 98199
9 DIRECT TELEPHONE: 206.729.5252
10 DIRECT FAX: 206.729.1012
11 E-MAIL: JOHN@MERRIAM-MARITIMELAW.COM

12
13
14
15
16
17
18
19
20
21
22
23
24
25 JOINT STATUS REPORT - 4

26 Case No. CV10-1427 MJP

WEBB LAW FIRM
225 106TH AVENUE N.E.
BELLEVUE, WA. 98004
TEL. 425-454-3800